IN THE UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF ILLINOIS EASTERN DIVISION

TRUSTEES OF THE SUBURBAN TEAMSTERS)
OF NORTHERN ILLINOIS WELFARE AND)
PENSION FUNDS,)
)
Plaintiffs,)
) Case No.: 2014 C 4805
v.)
) Judge Zagel
)
SELLERS & SELLERS ENTERPRISES) Magistrate Judge Cole
INC., an Illinois corporation,)
)
Defendant.)

MOTION FOR JUDGMENT IN SUM CERTAIN

NOW COME the Plaintiffs, TRUSTEES OF THE SUBURBAN TEAMSTERS OF NORTHERN ILLINOIS WELFARE AND PENSION FUND, by and through its attorney, JOHN J. TOOMEY, ARNOLD AND KADJAN, and pursuant to FRCP 55 move for judgment in sum certain as stated in this Complaint and the supporting Affidavits attached hereto. In support of its Motion, Plaintiffs state as follows:

- 1. Suit was filed on June 25, 2014 for collection of delinquent contributions plus attorneys' fees, costs and interest under 29 U.S.C. 1132(g)(2).
- Corporate service was made upon SELLERS & SELLERS
 ENTERPRISES, INC., an Illinois corporation was made on the Defendant on July 15, 2014
 and a copy of the proof of service was filed with the court on July 24, 2014.
- 3. Defendant is now in default as to the Complaint and as supported by the attached Affidavits the sums due are:

\$15,787.64 Pension
\$13,030.23 Welfare
\$925.00 Attorneys fees
\$498.00 Court costs
\$30,240.87

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WHEREFORE, Plaintiffs pray for:

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1. Entry of judgment against Defendant, SELLERS & SELLERS
ENTERPRISES, INC., an Illinois corporation, and in favor of Plaintiffs, TRUSTEES OF
THE SUBURBAN TEAMSTERS OF NORTHERN ILLINOIS WELFARE AND
PENSION FUNDS in the amount of \$30,240.87

TRUSTEES OF THE SUBURBAN TEAMSTERS OF NORTHERN ILLINOIS WELFARE AND PENSION FUNDS

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Dated: August 22, 2014